

**To:** Diamond, Lawrence W.[LWDiamond@duanemorris.com]  
**From:** Mugdan, Walter  
**Sent:** Thur 1/11/2018 1:31:50 PM  
**Subject:** RE: Diamond Alkali Superfund Site

Got it; thanks.

**From:** Diamond, Lawrence W. [mailto:LWDiamond@duanemorris.com]  
**Sent:** Thursday, January 11, 2018 8:00 AM  
**To:** Mugdan, Walter <Mugdan.Walter@epa.gov>  
**Subject:** Diamond Alkali Superfund Site

Walter,

See paragraph 106:

106. Settling Party shall, with respect to any suit or claim brought by it for matters

related to this Settlement Agreement, notify EPA in writing no later than 60 days prior to the initiation of such suit or claim. Settling Party also shall, with respect to any suit or claim brought against it for matters related to this Settlement Agreement, notify EPA in writing within 10 days after service of the complaint or claim upon it. In addition, Settling Party shall notify EPA

within 10 days after service or receipt of any Motion for Summary Judgment and within 10 days

after receipt of any order from a court setting a case for trial, for matters related to this Settlement

Agreement.

Larry

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